

**IN THE TENNESSEE REGULATORY AUTHORITY
NASHVILLE, TENNESSEE**

**IN RE: GENERIC DOCKET
ADDRESSING RURAL UNIVERSAL
SERVICE**

DOCKET NO. 00-00523

PETITION TO INTERVENE

Comes Paul G. Summers, the Attorney General & Reporter, through his Consumer Advocate and Protection Division, pursuant to Tenn. Code Ann. § 65-4-118(c)(2)(A), and petitions to intervene in this case on behalf of the public interest of consumers who will be affected by actions taken in this docket on the means, methods and scope of funding Universal Service in rural areas. For cause the Petitioner would show as follows:

I.

1. The Attorney General through the Consumer Advocate and Protection Division is authorized by Tenn. Code Ann. § 65-4-118 (c)(2)(A) to initiate a contested case, and participate or intervene in proceedings to represent the public interest of Tennessee consumers in accordance with the Uniform Administrative Procedures Act (UAPA).

2. A Generic Docket Addressing Rural Universal Service has been opened at the Tennessee Regulatory Authority ("TRA"), Docket No. 00-00523.

3. Tenn. Code Ann. § 65-5-207(a) provides as follows:

Universal service, consisting of residential basic local exchange telephone service at affordable rates and carrier-of-last resort obligations must be

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maintained after the local telecommunications markets are opened to competition. In order to assure the availability of affordable residential basic local exchange telephone service, the authority shall formulate policies, promulgate rules and issue orders which require all telecommunications service providers to contribute to the support of universal service.

4. The Generic Docket Addressing Rural Universal Service pending before the TRA will address many issues that are of importance to the public interest and the interest of Tennessee consumers. The funding for the Universal Service fund will ultimately be paid by Tennessee consumers. In addition, Tennessee consumers in rural areas may be adversely affected if the fund is not sufficient to maintain adequate levels of service.

5. Furthermore, this docket will also address the issue of BellSouth Telecommunications, Inc.'s decision to terminate the "Toll Settlement Agreements" between BellSouth and rural telephone companies. The "Toll Settlement Agreements" set the rates at which BellSouth compensates the rural carriers for the use of the rural carriers' lines for calls made by BellSouth customers; these charges are known as "access charges." At the present time, these "Toll Settlement Agreements" provide significant revenue to rural telephone companies. If these revenues are discontinued on January 1, 2001, as BellSouth has stated that it intends to do, the loss of revenue could lead to higher rates for certain rural telephone customers.

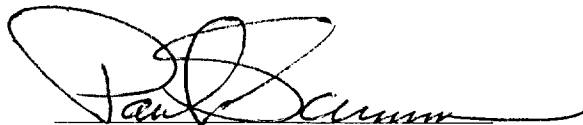
6. Only by intervening and participating in this proceeding can the Attorney General represent the public interest and the interests of Tennessee consumers.

7. If the Attorney General is allowed to intervene it will keep to the procedural schedule as set forth by the TRA at its conference on October 31, 2000, and would only ask for

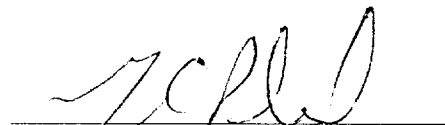
extensions of time for reasons unknown at the present time (such as illness, unexpected absence, etc.).

Wherefore the Attorney General prays that the Authority grant its Petition to Intervene.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Paul G. Summers", written over a horizontal line.

PAUL G. SUMMERS, 6285
Attorney General & Reporter

A handwritten signature in black ink, appearing to read "Timothy C. Phillips", written over a horizontal line.

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Certificate of Service

I hereby certify that a true and correct copy of the Petition to Intervene was served on parties below via U.S. Mail, postage prepaid, this November 5th, 2000.

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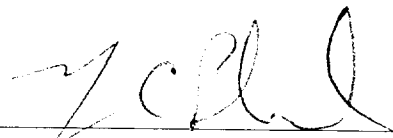
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